REMARKS

As a preliminary matter, Applicants respectfully traverse the Examiner's assertion that the Information Disclosure Statement ("IDS") filed December 4, 2001, fails to comply with 37 C.F.R. 1.98(a)(2), as well as 37 C.F.R. 1.98(a)(3). With respect to the section 1.98(a)(2) assertion, Applicants traverse because legible copy of every foreign patent listed on the Form PTO-1449 was submitted to the Patent Office, along with a translated Abstract of each listed patent in English, with the exception only of the JP 9-5739 reference, as also clearly noted on the Form PTO-1449. A translation of JP 9-5739 was not available to Applicants at the time the IDS was filed.

It was inappropriate for the Examiner to refuse to consider the entire IDS because of the single reference. The Examiner should have initialed the appropriate individual box next to each reference for which a translated Abstract was provided. The translated Abstract has since become available to Applicants, and if filed concurrently herewith in a Supplemental IDS and new Form PTO-1449. Applicants therefore respectfully request that the Examiner acknowledge the IDS.

With respect to the Examiner's assertion with respect to Section 1.98(a)(3), Applicants also traverse because the explanation of relevance requested by the Examiner only applies to Section 1.98(a)(3)**(i)**, and not to Section 1.98(a)(3)**(ii)**. Applicants submit that the IDS fully complied with Section 1.98(a)(3)(ii), with the exception of JP 9-5739, as noted above, and therefore should have been given consideration and acknowledgement by the Examiner. Applicants further note that it is common practice to provide translated Abstracts

only of foreign patent references. Applicants further note that the submitted Form PTO-1449 specifically indicates that only translated Abstracts were provided, and in no way indicates that Applicants were submitting fully translated foreign patent references. Accordingly, the Examiner should give full consideration and acknowledgement of the IDS, and do so by providing Applicants with an initialed copy of the submitted Form PTO 1449.

As a second preliminary matter, Applicants do wish to alert the Examiner to one typographical error on the original IDS submitted on December 4, 2001. Specifically, the JP 60-16813 reference listed on the IDS was an inadvertent error. Applicants instead meant to disclose the relevant JP 60-168134 reference, and note on the record that Applicants do not consider the JP 60-16813 reference relevant to the present Application. Accordingly, the Supplemental IDS and new Form PTO-1449 contain such a translated English Abstract. Consideration and acknowledgment of the Supplemental IDS is respectfully requested. Additionally, the Specification to the present Application has also been amended to correct for the same typographical error.

Claims 1-5, 7, 10, 12-18, 20-22, and 28 stand rejected under 35 U.S.C. 102(b) as being anticipated by Sekiguchi et al. (U.S. 4,978,890). Claim 2 has been cancelled without prejudice, and its subject matter incorporated into independent claim 1, rendering the rejection with respect to claim 2 now moot. Applicants otherwise respectfully traverse this rejection as follows.

With respect to amended claim 1 of the present invention (and its dependent claims 3-5 and 7), Applicants traverse the rejection because the cited reference does not

disclose (or suggest) a backlight having a heat conduction member adhered to a discharge tube or a reflector, or otherwise in a bonding state equal to or stronger than a hydrogen bond.

The Examiner asserts that Sekiguchi's heat conducting compound 70 is analogous to the recited heat conduction member of the present invention. Sekiguchi, however, nowhere teaches or even suggests that the heat conducting compound 70 is actually adhered to either the fluorescent lamp 10, or the Peltier element 30. Sekiguchi only discloses that the compound 70 is the vehicle by which the Peltier element 30 is attached to the fluorescent lamp 10. (See col. 2, lines 52-54). Nowhere does Sekiguchi suggest that the attachment of these several elements ever amounts to an *adhesion*, or at least a bonding state equal to or stronger than a hydrogen bond. The Examiner's assertion to the contrary is therefore erroneous, and the Section 102 rejection should therefore be withdrawn.

With respect to independent claims 10, 22, and 28, Applicants respectfully traverse the rejection because the cited reference fails to teach or in any way suggest any collection of mercury at any position in a discharge tube. In fact, Sekiguchi only even refers to mercury with respect to a prior art mercury resonance radiation intensity (See Fig. 1; col. 1, lines 14-22), and otherwise never discusses any collection of mercury. The Examiner's assertion to the contrary therefore, is without any support from Sekiguchi, and the Section 102 rejection of these claims (as well as claim 10's dependent claims 12-15, 18, and 20-21) should be withdrawn.

With respect to independent claims 10 and 22 in particular, Applicants further traverse the rejection because Sekiguchi fails to teach any liquid or gaseous mercury at all, or

that most of the liquid mercury is collected. Applicants are at a loss to understand the Examiner's assertion to this effect, when the single cited reference is utterly silent regarding these features of the present invention. Accordingly, for at least these reasons, the rejection should be withdrawn.

Claim 8 stands rejected under 35 U.S.C. 102(b) as being anticipated by Davis (U.S. 3,777,199). Applicants respectfully traverse this rejection because the cited reference does not disclose (or suggest) a reflector, or blowing means for blowing air to a part of a discharge tube between a plurality of discharge tubes.

Davis merely teaches a lamp assembly having a single lamp 18 and a blower 36 for blowing air across an entire length of the lamp 18. Davis further discloses a first housing member 30 that covers the lamp 18, but does not disclose that the housing member 30 functions as a reflector, as asserted by the Examiner. In fact, Davis teaches the opposite. Davis specifically teaches that the first housing member 30 is formed from a heat resistant and light transmissive material, preferably a Pyrex glass pipe. (See col. 4, lines 20-24). In other words, Davis specifically teaches away from the housing member 30 being reflective, when the housing member is instead disclosed to transmit light through its material. Applicants further note that one skilled in the art is well apprised that Pyrex glass is clear, and not reflective. For at least these reasons, the rejection of claim 8 should be withdrawn.

The rejection of claim 8 should further be withdrawn because nowhere does Davis teach or even suggest that the blower 36 can blow air to a part of the lamp 18 between a plurality of such lamps. First, Applicants respectfully point out that Davis' blower 36 does

not blow air to only a part of the lamp 18, but is instead shown to clearly blow air across the entire length of the lamp. Second, although the Examiner is correct that Davis does teach that a plurality of the lamps 18 could be positioned within one housing, nowhere does Davis teach or even suggest how the blower would function to blow air to only a part of any particular lamp between the multiple lamps. Again, Davis only shows a blower that can be used in conjunction with multiple lamps to blow air across the entire length of all of the lamps. Nowhere does Davis teach, suggest, or infer that the blower 36 functions toward any particular part of any lamp 18, or between any point between the generally suggested plurality of lamps. Accordingly, for at least these additional reasons, the Section 102 rejection should be withdrawn.

Claim 6 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Sekiguchi in view of Loda et al. (U.S. 4,409,511). Applicants respectfully traverse this rejection for at least the reasons discussed above with respect to the rejection of independent claim 1 based on Sekiguchi alone. Claim 6 depends from independent claim 1, and therefore includes all of the features of the base claims, plus additional features. Applicants further traverse this rejection because Loda is drawn to a phase transition cooled window for a broad beam electron gun, and is therefore not applicable to the present invention, which is drawn toward a backlight of a display device. The Examiner has provided no rationale to support the proposed combination of the two different technologies. Additionally, Loda fails to compensate for the deficiencies of the Sekiguchi reference alone, as discussed above. Accordingly, the Section 103 rejection of claim 6 should also be withdrawn.

Claims 11, 16-17, and 19 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Sekiguchi. Applicants respectfully traverse this rejection for at least the reasons discussed above with respect to independent claim 10. Claims 11, 16-17, and 19 all depend either directly or indirectly from independent claim 10, and therefore should be allowable over the single cited prior art reference for at least the reasons discussed above with respect to the rejection of claim 10.

For all of the foregoing reasons, Applicants submit that this Application, including claims 1-8, 10-22, and 28, as well as claims 23-27 and 29-52, is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if an interview would expedite prosecution.

Respectfully submitted,

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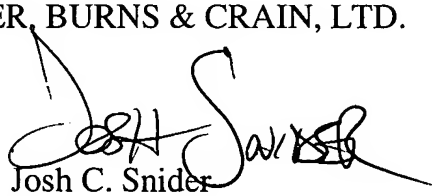
By 

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